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Counsel for Plaintiff

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

ROBERT COHEN, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

FOOTHILL/EASTERN
TRANSPORTATION CORRIDOR
AGENCY; SAN JOAQUIN HILLS
TRANSPORTATION CORRIDOR
AGENCY; 3M COMPANY and BRIC-
TPS LLC,

Defendant.

) Case No: SACV 15-01698 DDP
) (DFMx)
)
) **PLAINTIFF'S NOTICE OF**
) **MOTION AND MOTION FOR**
) **APPROVAL OF AN AWARD OF**
) **ATTORNEYS' FEES, COSTS**
) **AND EXPENSES, AND**
) **INCENTIVE AWARD TO**
) **PLAINTIFF**
)
) Date: March 5, 2018
) Time: 10:00 a.m.
) Courtroom: 3
)
) **Judge: Hon. Dean D. Pregerson**
)
)
)

TO ALL PARTIES AND TO THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE THAT on March 5, 2018, at 10:00 a.m. before the Honorable Dean D. Pregerson, United States District Court Judge for the Central District of California, 350 West 1st Street, Los Angeles, CA. 90012, Plaintiff Robert Cohen, by and through his undersigned counsel of record, will move for an Order approving the award of attorneys' fees, reimbursement of litigation costs and expenses, and payment of incentive award to Plaintiff, consistent with the agreement of the parties reflected in the Settlement Agreement previously submitted to the Court.

In support of this Motion, the parties submit, as more fully described in the accompanying Memorandum of Points and Authorities in support of the Motion, the supporting declarations and exhibits thereto, and any other written and oral arguments that may be presented to the Court, that this the award of attorney fees, reimbursement of costs and expenses, and payment of an incentive award is proper given that the parties agreed in their Settlement that Class Counsel may make such an application, the work of Class Counsel and Plaintiff has conferred substantial benefits to the Class, and that such awards are permitted under the law of this Circuit.

This Motion is based on the Court's Order (1) conditionally certifying a settlement class, (2) preliminarily approving class action settlement, (3) approving notice plan, and (4) setting final approval hearing; and for limited production of personally identifiable information to facilitate administration of class settlement, issued on November 13, 2017 (Dkt. No. 71), and the papers submitted in support of that motion, which are also incorporated by reference, Dkt. 65.

CIVIL RULE 7-4(a)(3) STATEMENT OF ISSUE TO BE DECIDED

Whether the Court should award attorneys' fees, reimbursement of litigation costs and expenses, and payment of an incentive award to Plaintiff.

Dated: December 15, 2017 WESTERMAN LAW CORP.
JEFF S. WESTERMAN

By: Jeff S. Westerman
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